

Eric F. Pastor  
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2201 Double Creek Drive, Suite 4004  
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas  
Unilateral Administrative Order, CERCLA Docket No. 06-05-05  
Draft Preliminary Site Characterization Report (PSCR)

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated November 2, 2010. The enclosed comments shall be incorporated in the Final PSCR and copies provided to the notification list within twenty (20) days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov).

Sincerely yours,

Gary Miller, P.E.  
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)  
Susan Roddy  
Dipanjana Bhattacharya  
Barbara Nann

miller:11/5/2010:L:\Superfund\oversight\gulfco draft pscr comments 11-5-2010

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**Gulfco Marine Maintenance Superfund Site, Freeport, Texas**  
**Draft Preliminary Site Characterization Report (PSCR)**

**Comments:**

1. Discussion shall be added regarding whether freezing only the control samples affected the results.
2. (Sec. 1.2; p. 7 & 8): The PSCR includes several statements regarding the hydrological isolation of the wetlands and ponds from Oyster Creek and tidal fluctuations. These statements are not supported by data in the PSCR or references and shall be deleted.
3. (Sec. 2.1.2; p. 13): The PSCR states that the most relevant comparison is site to reference/background toxicity. It should also be mentioned that biological significance (in addition to statistical significance) will be considered in the BERA.
4. (Sec. 2.2.1; p. 14): The PSCR states that TCEQ soil benchmarks are not available for the organics 4,4-DDT and Aroclor-1254. While there are no benchmarks for these chemicals in soil, there are benchmarks for these chemicals in sediments. Because the surface materials at the site are generally similar, whether described as soil or sediment, because the material is intermittently flooded due to tides and rainfall, and because the toxicity test had to be revised to treat the material as sediment, this statement shall be deleted, and the sediment benchmarks shall be included for these chemicals.
5. (Sec. 2.3.1; p. 16; and p. 20): There is a difference noted in the RI/FS media data compared to the media data from 2010. The PSCR shall state whether the RI/FS data is pre- or post- Hurricane Ike.
6. (Sec. 2.3.2; p. 19): It was noted that control failure of the Artemia test occurred at 96 hours in the third run for the surface water acute toxicity testing. Discussion shall be added regarding whether this met acceptability criteria for the control. The PSCR shall also include a discussion of why the level of acute mortality did not match the slight benchmark exceedances.
7. (Table 1): The soil benchmarks for barium (300 mg/kg) and for chromium (30 mg/kg) are different from the benchmarks listed in Table 6 of the *Baseline Ecological Risk Assessment Work Plan and Sampling and Analysis Plan* (BERA WP & SAP), which are 330 mg/kg and 0.4 mg/kg, respectively. The benchmarks for barium and chromium shall be corrected to the values listed in the BERA WP & SAP.
8. (Table 2): No benchmarks are provided for endrin aldehyde, endrin keytone, benzo (g,h,i) perylene, and indeno (1,2,3-cd) pyrene. The BERA WP & SAP lists

benchmarks for these chemicals, and these benchmarks shall be included in the PSCR.

9. (Table 2 and Table 6): It is acknowledged that the laboratory ran a canned statistical package on the comparison between reference/background samples and the laboratory controls. However, any statistics that indicate there is no significant difference between 81.5% survival (lab control for amphipod) and 33% survival (EWSED08), and 19% survival (EWSED09), and 42% survival (EIWSED06) appears suspect. This apparent discrepancy shall be revisited/addressed.
10. (Table 2 and Figure 4): Regarding the analysis results for 2-methylnaphthalene in sample EWSED05, Table 2 shows the result as a low concentration for gradient purposes, while in Figure 4 the same result is shown as a high concentration. This inconsistency shall be corrected, and all of the concentration characterizations in the tables and figures shall be reviewed for accuracy and corrected as necessary.
11. (Figures 3, 4, 6, and 7): The analysis results on these figures do not include units. The sample result units shall be added to these figures.
12. Any available observations (both field and laboratory) describing/documenting the presence of benthic invertebrates in collected site sediment samples shall be included and discussed. If a lack of invertebrates in both site and reference/background samples is observed, it may be indicative of harsh conditions.
13. The PSCR shall note whether any ammonia and pH data were collected with the field data, and include any such results in the PSCR.
14. The PSCR shall state whether any samples were archived and whether there is any remaining sample holding times.